

**REMARKS**

Claims 1-9, 11-19, 21-23, 25-27 and 29-37 are pending in the application.

Claims 1-9, 11-19, 21-23, 25-27 and 29-37 have been rejected.

**Rejection of Claims under 35 U.S.C. § 102**

Claims 1-9, 11-19, 21-23, 25-27 and 29-37 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication 2003/0018702 issued to Broughton *et al.* (“Broughton”). Applicants respectfully traverse this rejection.

Independent Claims 1, 15, 23 and 27 each contain claim limitations of the following form:

- Forming a list of routes, wherein each route includes information related to the type of communication media available around the route for handling one or more of the work items; and
- Entering one or more escalation rules for a route, wherein each of the escalation rules comprises a definition of processing for a work item along the route.

*See, e.g.*, Claim 1. Applicants submit that Broughton does not provide any disclosure of either of these two claim limitations.

As an initial matter, Applicants respectfully submit that the particular parts of Broughton that the Examiner has relied upon have not been designated as nearly as practicable, as required by 37 C.F.R. §1.104(c)(2). Instead, the Office Action cites to large sections of text from Broughton from which it is difficult to ascertain the relevant disclosure. Nevertheless, Applicants have made every attempt to respond to the rejections cited in the Office Action.

As illustrated above, each of the independent claims includes a limitation directed toward “a list of routes.” As disclosed in the present Application, a “route” represents a

specific way to process a work item. *See* Application, p.18, ll.7-8. Routes are associated with properties that “define the characteristics of the work to be performed using the route, and as many properties as desired can be defined for the route.” Application, p.35, ll.18-20. The Application further discloses a mechanism for entering and storing route properties. *See* Application, p. 35, ll. 1-5. Those properties provide a set of parameters that are used by the disclosed Universal Queuing Engine to determine how to handle work items according to the preferences associated with those properties. *See, e.g.,* Application p.35, ll.14-16. The disclosed Universal Queuing Engine uses this stored list of routes, which includes the associated properties of those routes, to form a comparison to characteristics of work items. If a match is found between properties associated with a route and characteristics of a work item, then the work item can be handled according to that route. *See* Application, p.36, ll.17-22. Each of the independent claims provides a limitation including a list of routes or forming a list of routes.

Applicants respectfully submit that Broughton provides no disclosure of a list of routes. Broughton discloses a call center system that first associates a contact with an initial service tier based upon its media type, and then can subsequently escalate or de-escalate the contact to a different service tier based upon routing criteria. *See, e.g.,* Broughton, ¶[0026]. Broughton defines an agent using the agent’s address attributes, and then determines whether or not to assign a contact to a given agent using requirements within that contact and attributes of the agent. Broughton, ¶[0042]. Broughton’s agent characteristics do not rise to the level of the routes disclosed and claimed by the present Application, which include a richness of features such as conditional characteristics, virtual skills, macro substitution and the like.

Further, the list of routes and associated properties in the Application relates not to a description of an agent, but rather to characteristics associated with a work item. Work items having characteristics matching a route's properties can be presented to queues or other work handling mechanisms that are associated with the route. Once associated with a route, a work item can be processed according to the parameters of that route. For this additional reason, Applicants submit that Broughton's agent characteristics are not equivalent to the claimed and disclosed routes. For at least these reasons, Applicants respectfully submit that Broughton does not provide disclosure of the claimed "list of routes" found in each of the independent claims.

The Application also provides escalation rules that "define the way that a work item should be processed. The escalation rules can generalize the skill requirement of a work item so that the chance of having the work item served is improved." Application, p.33, ll.11-13. The mechanism behind an escalation rule is further explained by the present application in the following:

When UQ engine 306 receives a work items, it attempts to match an agent having the desired skill to handle the work item. If an agent who has the desired skills cannot be found, the next escalation rule can specify fewer, or more common skills, thus making it more likely that an agent with the reduced scope of skills can be found.

Application, p.39, ll.1-4. In this manner, escalation rules can generalize parameters of a work item so that one or more additional routes can be made available for selection in order to best serve the work item.

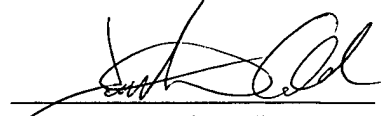

Applicants respectfully submit that Broughton does not describe escalation rules with the characteristics described by the Application and as claimed. Broughton merely provides a mechanism for a user to enter a desire to escalate an item (in the voice or internet modes of operation) or for moving an email to an immediate response scheme

upon the expiration of a period of time. Broughton provides no capacity for automatically performing such escalation by supplying an "escalation rule" that can be used by a method and system of the present invention to escalate processing of a work item, as claimed and described by the present Application. Indeed, since Broughton fails to provide a list of routes with associated properties, Broughton cannot provide escalation rules that serve to generalize characteristics of work items to be compared with route properties. For at least these reasons, Applicants respectfully submit that Broughton does not provide disclosure of escalation rules as provided in the independent claims.

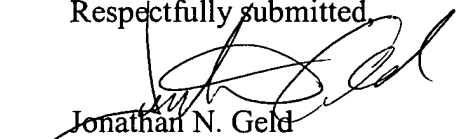
For at least the above reasons, Applicants respectfully submit that Broughton does not provide disclosure of each limitation of independent Claims 1, 15, 23 and 27 and therefore does not render these claims, or any claims dependent thereon, anticipated under 35 U.S.C. § 102(e). Applicants therefore respectfully request the Examiner's reconsideration and withdrawal of these rejections.

### CONCLUSION

In view of the amendments and remarks set forth herein, the application and the claims therein are believed to be in condition for allowance without any further examination and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5090.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, COMMISSIONER FOR PATENTS, P. O. Box 1450, Alexandria, VA 22313-1450, on February 27, 2006.	
 _____ Attorney for Applicant(s)	 _____ Date of Signature

Respectfully submitted,

  
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